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June 7, 2024

By ECF and Email

The Honorable Natasha C. Merle
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Halima Salman, 24-cr-206 (NCM)

Dear Judge Merle:

I write on behalf of Ms. Salman to respectfully make two requests. First, a modification of Ms. Salman's bail conditions in accordance with Paragraph 2(a) of the bond, which contemplates a revision of conditions in consultation with Pretrial Services to permit remote participation in certain programming. *See* ECF No. 20 at 2. Pretrial Services has proposed the following language, which has been modified slightly where italicized to clarify that internet use is permitted only with respect to authorized treatment providers, and to include court appearances where the Court has approved Ms. Salman to appear remotely by videoconference:

The defendant may not use a computer and/or access the internet through any means, except for the following: computer use, and internet access is permitted only as may be necessary to communicate with Pretrial Services, defense counsel for legal purposes, *authorized* treatment providers, Parents for Peace, and *video court appearances when authorized*.

The proposed modification would supersede the language at Page 2, Paragraph 3 of the bond prohibiting internet usage, although the subsections to Paragraph 3 would remain in effect. Page 3 of the bond would also be modified to permit internet access for the limited purposes described above. As already reflected on Page 3 of the bond, Ms. Salman is required to participate in Pretrial Services' Computer Restriction and Monitoring Program.

Second, given the time and logistics of travel to the Eastern District of New York, I would request that Ms. Salman be permitted to participate remotely, by video or teleconference, in the status conference currently scheduled for June 18 at 10:30 a.m., and that her in person appearance be waived.

The government has no objection to the proposed bond modification or to the waiver of in person appearance, provided that Ms. Salman appears by video or teleconference.

Thank you for your consideration.

Respectfully Submitted,

/s/
Samuel Jacobson
Assistant Federal Defender
(718) 407-7429

cc: all counsel of record (by ECF)
U.S. Pretrial Services (by Email)